

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

JOHN RITCHIE)
)
 Plaintiff,) Cause No. 2:19-cv-04216-BCW
)
 v.)
)
 MISSOURI DEPARTMENT OF)
 CORRECTIONS, et al.,)
)
 Defendants.)

**MEMORANDUM IN SUPPORT OF PLAINTIFF'S
PLAINTIFF'S MOTION FOR ADDITIONAL TIME TO SERVE DEFENDANTS**

Plaintiff moves for additional time to serve certain defendants. In support of his motion, Plaintiff states as follows.

1. Plaintiff filed his Complaint on December 5, 2019.
2. Pursuant to Federal Rule of Civil Procedure 4, if a defendant is not served within 90 days after the complaint is filed, the court "must dismiss the action without prejudice against that defendant or order that service be made within a specified time. But if the plaintiff shows good cause for the failure, the court must extend the time for service for an appropriate period."
3. Pursuant to Rule 4, the deadline to serve Defendants is March 4, 2020.
4. Upon filing his Complaint, Plaintiff sent notice and waivers to each Defendant. Other than Missouri Department of Corrections, George Lombardi, and Corizon LLC, the notices and waivers were returned to sender.
5. On or about January 16, 2020, after researching new addresses, Plaintiff sent new notices and waivers to Defendants Pryor, Hucke, Bredeman, Cofield, Swartz, Rogers, Laramore and Khengar.

6. Upon information and belief, Defendants Pryor, Hucke, Bredeman, Cofield, Swartz, Rogers, Laramore and Khengar are current or former employees of Corizon LLC.

7. Counsel for Corizon LLC has entered appearance for Defendants Pryor, Bredeman, Cofield, and Khengar.

8. Counsel for Corizon LLC has indicated that they are in contact with Defendants Swartz, Rogers, and Laramore, and that barring an unforeseen issue, they plan on representing them. Plaintiff expects all but one of the defendants make an appearance in the case in the next few days.

9. Neither Plaintiff nor counsel for Corizon LLC has been able to contact Defendant Hucke.

10. Plaintiff is working diligently to locate and serve Defendant Hucke.

11. Accordingly, Plaintiff has established good cause for failing to serve the remaining defendants.

12. Plaintiff requests the court to extend the time of service for 45 days.

WHEREFORE, Plaintiff requests this Court grant his Motion for Additional Time to Serve Defendants, extend the deadline to serve Defendants to April 20, 2020, and for further relief this Court deems just and proper.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that on February 28, 2020, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

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